

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

**NOTICE OF MOTION**

07 Cr. 944 (LTS)

-v-

COREY ROBERTSON, et al

Defendants.

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SIRS:

PLEASE TAKE NOTICE, that upon the annexed affirmation of Richard H. Rosenberg, Esq., attorney for defendant **COREY ROBERTSON** dated December 17, 2007 the Memorandum of Law submitted in support of the motion, and all prior proceedings heretofore had herein, the undersigned will move before this court, at the United States Courthouse located at 500 Pearl Street, New York, New York at a date and time convenient to the court:

1. For an order pursuant to Rule 7 (f) of the Federal Rules of Criminal Procedure directing the government to file a bill of particulars;
2. For an order pursuant to the inherent and supervisory powers of this court directing the Government to disclose, at this time, any purported prior or subsequent similar act (Rule 404 (b) ) evidence which the Government will seek to offer against defendant during the presentation of its case-in-chief;
3. For an order pursuant to Rule 16 of the Federal Rules of Criminal Procedure, directing the government to disclose the identities of any informants and files pertaining thereto;
4. For an order, pursuant to the Fifth, Sixth and Fourteenth Amendments to the Constitution,

the inherent and supervisory powers of this Court, and the decision in Brady v. Maryland, 373 U.S. 83 (1963) and its progeny, directing the Government to provide defendant with all the information in its possession, custody, or control, the existence of which is known or through the exercise of due diligence may become known, which is i) exculpatory or otherwise favorable to the defendant; ii) relevant to the credibility and/or character of the witnesses which the Government seeks to call at the trial of this indictment; or iii) reveals factual inconsistencies with the proof which shall be presented by the Government at trial;

5. For permission to join in the motions of the co-defendant to the extent the relief sought is consistent with relief sought herein;
6. For such other and further relief as to the court appears just and proper.

Dated: New York, New York  
December 17, 2007

Yours etc.,

Richard H. Rosenberg  
RR0846  
Attorney for defendant  
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To:

Parvin Moyne, Esq.  
Assistant United States Attorney  
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